

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DONNIKA D. HUDSON :  
:  
*Plaintiff,* : Case No.: 10 Civ. 3287 (LTS)(KNF)  
:  
-against- :  
:  
ASSET PROTECTION & SECURITY SERVICES :  
s/h/a, ASSET SECURITY, MARK BALCERZAK, :  
and ANGELA ELLIS, :  
*Defendants.* :  
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**PLAINTIFF'S PROPOSED**  
**VOIR DIRE**

**PLAINTIFF'S PROPOSED *VOIR DIRE***

Plaintiff, Donnika D. Hudson, by her attorney, The Harman Firm, PC, submits the following proposal *voir dire* for jury selection in this case. Plaintiff respectfully requests that the following questions be asked to potential jurors during *voir dire*, in addition to any standard questions asked by the Court:

1. What is your name?
2. Where do you live? How long have you lived there?
3. How old are you?
4. Are you married or do you have a domestic partner? What is your spouse's or partner's occupation?
5. Do you have any children? How many? Are any of them in school or employed?  
Where do they attend school or what do they do for a living?
6. What is the highest level of education you have completed?
7. Are you employed? Please give details.
8. Have you ever worked in a management or supervisory capacity? Describe.
9. Did your duties include terminating or demoting employees?
10. Have you ever terminated an employee that you supervised?
11. Have you ever been terminated or demoted from a position? Please describe.  
Will this experience affect your ability to render a fair and impartial verdict in this case?
12. Do you regularly read any newspapers, periodicals, or magazines?
13. Are there any talk radio, TV, websites, or blog programs that you regularly listen to or view? Please tell us.

14. Do you belong to any organizations? Which ones?
15. Do you attend religious services? Where?
16. Do you ever watch TV shows about courts, lawyers, or trials? Which one? What is your opinion on them? Do you think they will affect your judgment as a juror?
17. Have you, any members of your family, or close friends ever been employed by Asset Protection & Security?
  - (a) Please describe the agency and position.
  - (b) How long did you work there?
18. Have you, any members of your family, or close friends ever been involved in any dispute, complaint, or lawsuit with an employer?
  - (a) Please describe.
19. Have you ever been party to a lawsuit? Please describe.
20. Have you ever testified in court? If so, in what capacity?
21. Have you ever been a juror in any court system?
22. Have you, any members of your family, or close friends ever been discriminated against in the workplace?
  - (a) Please give details.
  - (b) Was there a resolution?
  - (c) Will that experience affect your ability to render a fair and impartial verdict in this case?
23. Have you, any members of your family, or close friends ever been accused of discriminating or retaliating against another employee or co-worker?
  - (a) Please give the details.

- (b) Was there a resolution?
  - (c) Will this experience affect your ability to render a fair and impartial verdict in this case?
24. Have you ever been employed in a detention center or jail? Has a close family member or close friend of yours been employed in a detention center or jail? If so, was that individual a female and do you believe they were treated fairly based on their gender?
25. Do you have any political, moral, or religious beliefs that might affect your ability to follow the law, as it is explained to you by the Court, or render a fair and impartial verdict in this case? Please describe.
26. If the Court were to give you an instruction about the law that you disagreed with, would you be able to set aside your personal views and follow the judge's instructions?
27. Is there any reason whatsoever why you think you might not be able to sit on this jury and serve as a fair and impartial juror in this case?
28. Is there any reason whatsoever why you do not want to serve on this jury?
29. Do you know the plaintiff, Donnika Hudson, or Defendant Angela Ellis or Defendant Marc Balcerzak? If so, how?
30. Do you know any of the lawyers involved in this case or Judge Swain? How?
31. Do you know any of the potential witnesses? How?
32. Do you know any of the other potential jurors? How?
33. Have you ever filed a complaint in court (Federal or State) or with any administrative agency such as the Equal Employment Opportunity Commission or

New York State Division of Human Rights or the New York City Human Rights Commission alleging discrimination?

34. If the answer to the preceding question is yes, please describe the basis for your claim and whether that claim has been resolved to your satisfaction.
35. Have you ever filed a complaint in court or with any administrative agency such as the Equal Employment Opportunity Commission or the New York State Division of Human Right alleging religious discrimination?
36. If the answer to the preceding question is yes, briefly describe the basis for the claim and whether that claim has been resolved to your satisfaction.
37. Have you ever filed a grievance against your employer?
38. If the answer to the preceding question is yes, briefly describe the nature of the grievance and whether the grievance has been resolved to your satisfaction.
39. Have you ever testified at a trial, deposition, or hearing?
40. If the answer to the preceding question is yes, briefly describe the matter for which your testimony was obtained.

Respectfully submitted,

/s/  
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